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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

12 EPIC GAMES, INC.,  
13  
14 Plaintiff, Counter-Defendant,  
15 v.  
16 APPLE, INC.,  
17 Defendant, Counterclaimant.

Case No. 4:20-cv-05640-YGR-TSH

**DECLARATION OF ELLEN LONDON  
IN SUPPORT OF NON-PARTY LYFT,  
INC.'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
TRIAL EXHIBITS**

The Hon. Yvonne Gonzalez Rogers

Trial: May 3, 2021

1 I, Ellen London, pursuant to Civil Local Rule 6-2, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and a member of the  
3 bar of this Court. I represent Lyft, Inc. (“Lyft”) in this matter. I have personal knowledge of the  
4 following facts and could testify to them if called to do so.

5 2. Pursuant to Local Rule 79-5, I submit this declaration in support of Lyft’s Administrative  
6 Motion to Seal Portions of Trial Exhibits.

7 3. Lyft received documents PX-0201, PX-2061, and PX-2240, or Exhibits A, B, and C,  
8 from Apple, Inc. (“Apple”). Apple partially redacted these documents to ensure that Lyft did  
9 not receive confidential information about any other entities.

10 4. On April 29, 2021, I communicated with counsel for Epic Games, Inc. (“Epic”)  
11 regarding Lyft’s motion to seal its confidential information from the exhibits and asked if Epic  
12 opposed. Epic’s counsel stated that Epic takes no position regarding Lyft’s motion to seal its  
13 information.

14 5. On April 29, 2021, I communicated with counsel for Apple regarding Lyft’s motion to  
15 seal and asked if Apple opposed. Apple’s counsel stated that Apple did not oppose Lyft’s  
16 motion.

17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
18 and correct and that I executed this declaration on April 30, 2021 in Berkeley, California.

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20 By: /s/ Ellen London  
21 Ellen London  
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